

John R. Kasich, Governor Mary Taylor, Lt. Governor Craig W. Butler, Director

Re:

March 8, 2017

Certified Mail: 70132630000037149187

Mr. Michael Zeilstra Tennessee Gas Pipeline Co. LLC 1001 Louisiana St., Suite 1000 Houston, TX 77002

Tennessee Gas Pipeline Station 209 Resolution of Violation (ROV) Air Permit Guernsey County 0630000001

Division of Air Pollution Control Subject: Resolution of Violation

Dear Mr. Zeilstra:

On August 4, 2016, the Technical Services Department of Kinder Morgan Corporation performed nitrogen oxides (NOx) emission compliance tests at Tennessee Gas Pipeline Station 209, located at 3428 Clay Pike Road, Cumberland, Ohio, on the 2500 horse power (hp) Cooper Bessemer engines Emissions Units (EUs) B012, B013 and B014. The emissions testing of EU B014 resolved the pending NOV dated November 10, 2015. To ensure that all the violations have been addressed, Ohio EPA has included Tennessee Gas Pipeline Station 209's response for each violation and its status.

Resolution of Violation

- Violation #1: Failure to conduct NOx emissions testing for EU B014 pursuant to the approved NOx SIP Compliance Plan for this facility Ohio Administrative Code (OAC) rule 3745-14-12(B) and OAC rule 3745-14-12(C)
 - (a) On August 4, 2016, NOx emissions testing was conducted at Tennessee Gas Pipeline Station 209 located on EU B014. Ohio EPA received the test report on August 17, 2016. The test report was reviewed and Ohio EPA concluded that the test was conducted according to the procedures specified in 40 CFR part 60, Appendix A, U.S. EPA Test Method ASTM D6522-00. The results of the test showed the source to be in compliance with the applicable Ohio EPA regulations and your facility's permit terms and conditions. The results of the test are as follows:

EU B014	
Tested Emission Rate	2.05 g NOx/hp-hr
Allowable Emission Rate	8 g NOx/hp-hr
Source Operating Rate	2229 hp

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Therefore, this violation is considered resolved.

Please note that this does not preclude the Director from seeking administrative or civil penalties pursuant to Ohio Revised Code section 3704.06 for the violation(s) noted in the November 10, 2015 NOV letter. The decision on whether to pursue or decline to pursue such penalties regarding these violations is dependent on several factors, one of which is the company's future compliance with Ohio EPA regulatory requirements.

Should you have any questions, please contact Racheal Davies, Ohio EPA Southeast District Office, at (740) 380-5246.

Sincerely,

Lisa Duvall

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Environmental Specialist 2 Ohio EPA - Division of Air Pollution Control

LD/cs

ec:

John Paulian/Jim Kavalec, DAPC/CO Jessica Kuenzli, Manager DAPC/SEDO Brian Dickens, US EPA